

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
Reading Division

IN RE:

ADAM NATHAN DELONG
KIRA MARIE DELONG

Debtors

Chapter 13
Case No. 22-13446-PMM

PENTAGON FEDERAL CREDIT UNION

Movant

v.

ADAM NATHAN DELONG
KIRA MARIE DELONG
Debtors

SCOTT F. WATERMAN
Trustee

Respondents

**NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY, RESPONSE DEADLINE AND
HEARING DATE**

Pentagon Federal Credit Union has filed papers with the court to lift the automatic stay as to one 2018 Chrysler Pacifica.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

1. If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, on or before **March 17, 2023**, you or your attorney must do all of the following things:
 - a) File with the court a written response or an answer explaining your position at:

United States Bankruptcy Court
The Gateway Building
201 Penn Street, Room 103
Reading, PA 19601

If you are required to file an answer electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

- b) You must also mail a copy to Movant's attorney:

Danielle Boyle-Ebersole
Orlans PC
200 Eagle Road, Suite 120
Wayne, PA 19087

2. If you or your attorney do not take the steps described in Paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an order granting the relief requested in the motion.
3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on **March 28, 2023 at 10:00 AM** in the Fourth Floor Courtroom, United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Reading, PA 19601.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in Paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Reading at (610) 208-5040 to find out whether the hearing has been cancelled because no one filed an answer.

Date: February 28, 2023

Respectfully Submitted,

/s/ Danielle Boyle-Ebersole
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